

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

IN THE MATTER OF:

KAREN A FITZPATRICK,
Debtor.

CHAPTER 13
CASE NO. 08-70406-SWR
JUDGE STEVEN W RHODES

TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

NOW COMES the Chapter 13 Trustee, Krispen S. Carroll, and objects to confirmation of the Chapter 13 Plan in the above matter pursuant to E. D. Mich. LBR 3015-3(a) as follows:

1. Trustee requires a copy of debtor's Judgment of Divorce.
2. Trustee objects to debtor's failure to list the domestic support creditor on Schedule E and the Chapter 13 mailing matrix.
3. Trustee objects to the changes made in Part II.F.1 of the Chapter 13 Plan which contradicts other language in that paragraph.
4. The Trustee requests that debtor's counsel file a Fee Application.
5. The Trustee objects to debtor's attorney's fee as being inconsistent between the debtor's Chapter 13 Plan, paragraph 9 of the Statement of Financial Affairs and the amended 2016(b) Statement.
6. Trustee requires a Payment Order and an amended Schedule J when the domestic support obligation ends and debtor's payment increases to \$202.50 semi-monthly.

WHEREFORE, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan.

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT
Krispen S. Carroll, Chapter 13 Trustee

November 4, 2009

/s/ Margaret Conti Schmidt
KRISPEN S. CARROLL (P49817)
MARGARET CONTI SCHMIDT (P42945)
MARIA GOTSIDIS (P67107)
719 Griswold Street
1100 Dime Building
Detroit, MI 48226
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CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed **TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN** with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

RONALD S SIEGEL
30150 TELEGRAPH #444
BIRMINGHAM, MI 48025-4549

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

KAREN A FITZPATRICK
508 N ALEXANDER
ROYAL OAK, MI 48067-0000

November 6, 2009

/s/ Barbara A. Ecclestone

Barbara A. Ecclestone
For the Office of the Chapter 13 Trustee-Detroit
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Detroit, MI 48226
(313) 962-5035
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